

UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

In re: FTX TRADING LTD., et al., Debtors.

Chapter 11 Case No. 22-11068 (JTD)

(Jointly Administered)

Response to One Hundred Twenty-Seventh Omnibus Objection to Certain No Liability Proofs of Claim

Claim Number: 58394

Claimant: Adam Schneebaum

2024 DEC -6 AM 8:59

CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

Introduction

I, Adam Schneebaum, hereby submit this response to the One Hundred Twenty-Seventh Omnibus Objection to Certain No Liability Proofs of Claim filed by the Debtors, FTX Trading Ltd. and its affiliates, in the above-captioned matter. This response is in relation to my Claim No. 58394, which was filed as a customer entitlement claim for \$8,433.06. Contrary to the Debtors' assertion, I have provided proper documentation to support my claim, and I respectfully request that my claim be allowed.

Background

On November 10, 2022, I initiated a withdrawal request of \$8,433.06 from my account with FTX US. I have attached evidence demonstrating that this withdrawal request was processed by FTX US, yet I have never received the funds in my bank account. The following documents support my claim:

- **Exhibit A:** Screenshot of the FTX US email confirmation of withdrawal request initiation.
- **Exhibit B:** Screenshot of the FTX US email confirmation of withdrawal processing.
- **Exhibit C:** Screenshot of the transaction summary showing that the bank transfer was initiated and processed, but never received in my bank account.
- **Exhibit D:** Screenshot of the complete withdrawal transaction history from the FTX platform.
- **Exhibit E:** Bank statement for JPMorgan Chase account ending in [REDACTED], demonstrating that no funds were received from FTX US despite the processed withdrawal.
- **Exhibit F:** Confirmation of ACH authorization via Stripe, showing that the linked bank account ends in [REDACTED], matching the account on the bank statement.

Statement of Facts

1. **Withdrawal Request Initiated:** On November 10, 2022, I received an email from FTX US confirming that a withdrawal request for \$8,433.06 had been initiated (Exhibit A).
2. **Withdrawal Processed:** Later on the same day, I received another email from FTX US confirming that the withdrawal had been processed (Exhibit B). The email explicitly states, "Your fiat withdrawal of \$8,433.06 USD has been processed. Please allow three to five business days for the transfer to arrive in your bank account."
3. **Funds Not Received:** Despite the withdrawal request being initiated and processed, I have never received the funds in my bank account. I have waited well beyond the specified three to five business days, but no deposit has occurred. Bank statements from my JPMorgan Chase account ending in [REDACTED] show no record of the funds being credited (Exhibit E).

4. **Account Linking Evidence:** On November 10, 2022, I linked my JPMorgan Chase Bank account ending in [REDACTED] to FTX US, as evidenced by the Stripe ACH authorization (Exhibit F). This is the only bank account ever linked to my FTX US account, and the last four digits of the account match the bank statement provided.

Detailed Timeline of Events

- **November 10, 2022:** Account at JPMorgan Chase ending in [REDACTED] linked to FTX US account via ACH authorization, confirmed through Stripe. This is the only bank account ever linked to my FTX US account.
- **November 10, 2022:** Withdrawal request made to FTX US for \$8,433.06, intended to be sent to the bank account ending in [REDACTED].
- **November 10, 2022 (Email Confirmation):** Received confirmation from FTX US that the ACH payment method had been approved for my linked JPMorgan Chase Bank account ending in [REDACTED]. This confirms the intended withdrawal destination matches the bank account on record.
- **November 10, 2022 (Withdrawal Processed):** FTX US sent an email stating the withdrawal of \$8,433.06 was processed successfully and would take 3-5 business days to arrive in my account.
- **November 11, 2022:** Another withdrawal of USDC was made, unrelated to the disputed transaction.
- **December 8, 2022:** Bank statement from JPMorgan Chase (account ending in [REDACTED]) shows no record of the \$8,433.06 deposit from FTX. Despite waiting well beyond the standard processing time, the funds never arrived.

Legal Grounds for Allowance of Claim

The Debtors have objected to my claim on the grounds of insufficient documentation. However, I have provided ample evidence demonstrating that the withdrawal request was processed by FTX US, yet the funds were never received in my bank account. Therefore, the Debtors still hold liability for this unfulfilled withdrawal request.

Under the relevant provisions of the U.S. Bankruptcy Code, specifically Sections 502 and 503, I am entitled to have my claim allowed as a valid claim against the Debtors. I have complied with all relevant procedures for making a withdrawal, and FTX US has confirmed the processing of the withdrawal.

Conclusion

I respectfully request that the Court overrule the objection to my claim and allow Claim No. 58394 in the amount of \$8,433.06. The attached exhibits provide ample documentation of my entitlement to the claimed amount, and I request that the Debtors be held accountable for the funds that were never transferred.

Respectfully Submitted,

Adam Schneebaum

Address: 200 E 71st St, Apartment 7L, New York, New York 10021

Date: Dec 3rd, 2024

Exhibits

- **Exhibit A:** Screenshot of email confirming withdrawal request.
- **Exhibit B:** Screenshot of email confirming withdrawal processing (sent).
- **Exhibit C:** Screenshot of the transaction summary showing that the bank transfer was initiated and processed, but never received in my bank account.
- **Exhibit D:** Screenshot of complete withdrawal transaction history from the FTX platform.
- **Exhibit E:** Bank statement for JPMorgan Chase account ending in 0905, demonstrating that no funds were received from FTX US despite the processed withdrawal.
- **Exhibit F:** Confirmation of ACH authorization via Stripe, showing that the linked bank account ends in [REDACTED], matching the account on the bank statement.

Exhibit A

FTX US withdrawal request

FTX US

<support@ftx.us>

to me

Thu, Nov 10, 2022, 4:34 PM

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Hello Adam Schneebaum,

We have received a request to withdraw 8433.06 USD from your FTX US account.

If you did not make this request, please change your password and contact customer support immediately.

Withdrawals are processed within one business day. FTX US is not responsible for delays or fees resulting from your bank or intermediary banks it uses. You can find more information at <https://help.ftx.us/hc/en-us/sections/360008262673-Deposits-Withdrawals>.

↶ Reply

↷ Forward

😊

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FTX US

inbox

FTX US fiat withdrawal sent - Your fiat withdrawal of 8433.06 USD has been processed. Please allow three to five business days for the transf...

11/10/22

☆

FTX US

inbox

FTX US withdrawal request - request to withdraw 8433.06 USD from your FTX US account. If you did not make this request, please change yo...

11/10/22

Exhibit B

FTX US fiat withdrawal sent

Inbox

FTX US <support@ftx.us>
to me

Thu, Nov 10, 2022, 4:34 PM

Hello Adam Schneebaum,

Your fiat withdrawal of 8433.06 USD has been processed. Please allow three to five business days for the transfer to arrive in your bank account.

Reply

Forward

Exhibit C

Exhibit D

Time	Coin	Quantity	Description
2021-09-06 06:37:28.922137	USDT	9841.76108500	deposit 175389
2021-09-06 12:46:57.451804	SOL	-0.00100000	spot_fee
2021-09-06 12:46:57.451804	SOL	1.00000000	spot_base
2021-09-06 12:46:57.451804	USDT	-142.21000000	spot_quote
2021-09-06 12:50:49.522397	SOL	-0.99900000	withdrawal 233860
2021-09-06 13:15:12.910859	USDT	-9699.55108500	withdrawal 233876
2022-08-03 00:58:56.184400	USD	1000.00000000	deposit 986365
2022-08-03 01:00:55.184163	USD	13409.66180000	deposit 986387
2022-08-03 01:12:29.188405	USD	10799.45760000	deposit 986497
2022-08-03 15:18:05.641201	USD	-10.00000000	withdrawal 1097004
2022-08-04 20:39:58.884951	USD	-8333.00000000	withdrawal 1100510
2022-11-10 21:34:56.183043	USD	-8433.06000000	fiat_withdrawal 35852
2022-11-11 03:11:45.648386	USD	-50.00000000	withdrawal 1488210
2022-11-11 03:20:38.778947	USD	-8283.05940000	withdrawal 1488372
2022-11-11 14:40:22.850597	USD	-100.00000000	withdrawal 1496125

Exhibit E

JPMorgan Chase Bank, N.A.

November 09, 2022 through December 08, 2022

Primary Account: [REDACTED]

CUSTOMER SERVICE INFORMATIONWeb site: **Chase.com**Service Center: **1-800-935-9935**Para Espanol: **1-877-312-4273**International Calls: **1-713-262-1679**

00207695 DRE 802 219 34322 NNNNNNNNNN 1 000000000 06 0000

ADAM M SCHNEEBAUM
230 BRINCKERHOFF CT
ENGLEWOOD NJ 07631-3103**Get tips for spotting a scam**

The four common signs it's a scam are: pretending to be someone you know, pressuring you to act immediately, presenting you with a conditional prize or problem, or asking you to pay in a specific way.

To learn more and see tips on how to help protect your money, visit chase.com/FraudAwareness

CONSOLIDATED BALANCE SUMMARY**ASSETS****Checking & Savings**

Chase Total Checking

Chase Savings

Total**ACCOUNT****BEGINNING BALANCE
THIS PERIOD****ENDING BALANCE
THIS PERIOD****TOTAL ASSETS****CHASE TOTAL CHECKING**

ADAM M SCHNEEBAUM

Account Number: [REDACTED]

CHECKING SUMMARY

	AMOUNT
Beginning Balance	\$18,299.22
Deposits and Additions	12,291.12
ATM & Debit Card Withdrawals	-60.00
Electronic Withdrawals	-23,996.11
Fees	-3.00
Ending Balance	\$6,531.23
Interest Paid Year-to-Date	\$0.29



November 09, 2022 through December 08, 2022

Primary Account: [REDACTED]

Your account ending in 0570 is linked to this account for overdraft protection.

TRANSACTION DETAIL

DATE	DESCRIPTION	AMOUNT	BALANCE
	Beginning Balance		\$18,299.22
11/09	[REDACTED]	-6,439.17	11,860.05
11/09	[REDACTED]	-3.00	11,857.05
11/14	[REDACTED]	300.00	12,157.05
11/14	[REDACTED]	-10,000.00	2,157.05
11/14	[REDACTED]	-1,700.00	457.05
11/15	[REDACTED]	4,156.56	4,613.61
11/16	[REDACTED]	3,000.00	7,613.61
11/16	[REDACTED]	-5.00	7,608.61
11/16	[REDACTED]	-5.00	7,603.61
11/17	[REDACTED]	-60.94	7,542.67
11/17	[REDACTED]	-5.00	7,537.67
11/17	[REDACTED]	-5.00	7,532.67
11/17	[REDACTED]	-5.00	7,527.67
11/18	[REDACTED]	25.00	7,552.67
11/18	[REDACTED]	-50.00	7,502.67
11/22	[REDACTED]	50.00	7,552.67
11/22	[REDACTED]	10.00	7,562.67
11/23	[REDACTED]	553.00	8,115.67
11/23	[REDACTED]	-5.00	8,110.67
11/25	[REDACTED]	-5.00	8,105.67
11/25	[REDACTED]	-5.00	8,100.67
11/25	[REDACTED]	-5.00	8,095.67
11/28	[REDACTED]	-60.00	8,035.67
11/29	[REDACTED]	40.00	8,075.67
11/30	[REDACTED]	4,156.56	12,232.23
12/01	[REDACTED]	-3,375.00	8,857.23
12/05	[REDACTED]	-2,300.00	6,557.23
12/08	[REDACTED]	-3.00	6,554.23
12/08	[REDACTED]	-3.00	6,551.23
12/08	[REDACTED]	-3.00	6,548.23
12/08	[REDACTED]	-3.00	6,545.23
12/08	[REDACTED]	-3.00	6,542.23
12/08	[REDACTED]	-3.00	6,539.23
12/08	[REDACTED]	-3.00	6,536.23
12/08	[REDACTED]	-3.00	6,533.23
12/08	[REDACTED]	-2.00	6,531.23
	Ending Balance		\$6,531.23

A Monthly Service Fee was **not** charged to your Chase Total Checking account. Here are the three ways you can avoid this fee during any statement period.

- Have electronic deposits made into this account totalling \$500.00 or more, such as payments from payroll providers or government benefit providers, by using (i) the ACH network, (ii) the Real Time Payment network, or (iii) third party services that facilitate payments to your debit card using the Visa or Mastercard network. (Your total electronic deposits this period were \$11,538.12. Note: some deposits may be listed on your previous statement)



November 09, 2022 through December 08, 2022

Primary Account: [REDACTED]

- **OR, keep a balance at the beginning of each day of \$1,500.00 or more in this account.**
(Your lowest beginning day balance was \$457.05)
- **OR, keep an average beginning day balance of \$5,000.00 or more in qualifying linked deposits and investments.**
(Your average beginning day balance of qualifying linked deposits and investments was \$20,407.64)



CHASE SAVINGS

ADAM M SCHNEEBAUM

Account Number: [REDACTED]

SAVINGS SUMMARY

	AMOUNT
Beginning Balance	\$2,643.90
Deposits and Additions	11,700.10
Electronic Withdrawals	-300.00
Ending Balance	\$14,044.00
Annual Percentage Yield Earned This Period	0.01%
Interest Paid This Period	\$0.10
Interest Paid Year-to-Date	\$3.07

TRANSACTION DETAIL

DATE	DESCRIPTION	AMOUNT	BALANCE
	Beginning Balance		\$2,643.90
11/14	[REDACTED]	10,000.00	12,643.90
11/14	[REDACTED]	1,700.00	14,343.90
11/14	[REDACTED]	-300.00	14,043.90
12/08	[REDACTED]	0.10	14,044.00
	Ending Balance		\$14,044.00

A monthly Service Fee was **not** charged to your Chase Savings account. You can continue to avoid this fee during any statement period by keeping a minimum daily balance in your account of \$300.00 or more.
(Your minimum daily balance was \$2,643)



November 09, 2022 through December 08, 2022

Primary Account [REDACTED]

IN CASE OF ERRORS OR QUESTIONS ABOUT YOUR ELECTRONIC FUNDS TRANSFERS:

Call us at 1-866-564-2262 or write us at the address on the front of this statement immediately if you think your statement or receipt is incorrect or if you need more information about a transfer listed on the statement or receipt.

For personal accounts only: We must hear from you no later than 60 days after we sent you the FIRST statement on which the problem or error appeared. Be prepared to give us the following information:

- Your name and account number;
- A description of the error or the transaction you are unsure about, and why you think it is an error or want more information; and
- The amount of the suspected error.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days (or 20 business days for new accounts) to do this, we will credit your account for the amount you think is in error so that you will have use of the money during the time it takes us to complete our investigation.

For business accounts, see your deposit account agreement or other applicable agreements that govern your account for details.

IN CASE OF ERRORS OR QUESTIONS ABOUT NON-ELECTRONIC FUNDS TRANSFERS: Contact us immediately if your statement is incorrect or if you need more information about any non-electronic funds transfers on this statement. For more details, see your deposit account agreement or other applicable agreements that govern your account.

JPMorgan Chase Bank, N.A. Member FDIC

Exhibit F



ADAM

021-4505

SHP WT: LTR
DATE: 04 DEC 2024BANKRUPTCY COURT DIST DELAWARE
824 N MARKET ST

WILMINGTON DE 19801



DE 197 9-25



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